

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF VIRGINIA
Charlottesville Division

IN RE: BETTY MCCLANAHAN
Debtor

CASE NO. 16-62232

MOTION TO APPROVE LISTING AGREEMENT AND EMPLOY REALTOR FOR SALE
OF REAL ESTATE

To the Honorable Rebecca B. Connelly, United States Bankruptcy Judge:

Your Debtor, by counsel, represents to the Court as follows:

1. This case was filed by the Debtor on November 3, 2016. The Debtor's proposed Chapter 13 Plan has not yet been confirmed.
2. The Debtor owns substantial real estate in the City of Charlottesville and in Albemarle County, Virginia. Her proposed plan provides for the sale of a number of contiguous parcels of real estate in the City, the proceeds of which are expected to be sufficient to pay in full all creditors provided for in her Plan.
3. To assist her in this sale, the Debtor has entered into a Listing Agreement, dated March 28, 2017, a copy of which is attached to this Motion, with Core Real Estate, LLC., a competent and reputable real estate broker located in Charlottesville, Virginia.
4. The Listing Agreement provides for a commission to the broker upon sale of the property of six percent (6%) of the sales price. Such commission is reasonable for real estate sales in the Charlottesville area.
5. Core Real Estate, LLC is not a creditor of the Debtor and has no interest adverse to the Debtor.

WHEREFORE, your Debtor, by counsel, moves this Court for approval of the above-described Listing Agreement, dated March 28, 2017, between the Debtor and Core Real Estate, LLC.

Respectfully submitted,
BETTY MCCLANAHAN

By counsel

/s/Douglas E. Little

DOUGLAS E. LITTLE, ATTORNEY AT LAW VSB#15238

710 East High St. (P.O. Box 254)

Charlottesville, VA 22902

434/977-4500

Counsel for the Debtor

CERTIFICATE

I certify that a true copy of the foregoing Motion was electronically transmitted to the Chapter 13 Trustee this 7th day of July, 2017.

/s/Douglas E. Little